

	<i>Watchtower, et al. v. Roberto Sanchez Ramos, et al.</i> Timekeeping Report Summary Nora Vargas Acosta, Esq.			
DATE	ACTIVITY	HOURS	RATE PER HOUR	TOTAL
9/25/2002	Meeting with counsel Polidoro regarding intended action	1.0	\$285.00	\$285.00
9/18/2003	Review literature on Jehova's Witnesses and Access Law and cases to evaluate intended action	2.0	\$285.00	\$570.00
9/24/2003	Meeting with counsel Polidoro; Evaluate possible Discovery & defendants; Meeting with Madeline Roman to discuss possibility of her appearance as witness	2.25	\$285.00	\$641.25
4/4/2004	Receive and review addendum to Expert Report; provide counsel Polidoro with copy; draft Communications to counsel Polidoro	0.5	\$285.00	\$142.50
5/13/2004	Review draft of complaint and Motion for Preliminary Injunction; legal research; conference with counsel Polidoro regarding complaint	5.5	\$285.00	\$1,567.50
5/14/2004	Meeting with Madeline Roman, discussed her area of research regarding crime in PR	1.0	\$285.00	\$285.00
5/18/2004	Meeting with professor Madeline Roman e: Crimes statistics, control access, Effects in Puerto Rico, Prepare Motion for Preliminary Injunction and Memorandum of Law; review final draft of complaint; review draft of Pro Hac Vice Motion to File in Excess	2.0	\$285.00	\$570.00
5/25/2004	Receive & revise order; Prepare Motion Submitting Proposed Order Under Rule 65.1	1.25	\$285.00	\$356.25
5/31/2004	Receive & revise Motion for Leave to appear	0.25	\$285.00	\$71.25
6/4/2004	Receive & revise Order re granting extension	0.25	\$285.00	\$71.25
6/21/2004	Receive & revise Motion to Dismiss Complaint and to File Excess Pages	0.75	\$285.00	\$213.75
6/22/2004	Receive & revise Order granting leave	0.25	\$285.00	\$71.25
8/24/2004	Telephone conference with counsel Polidoro regarding translation of Expert Report and other pending matters; review draft of opposition to request for preliminary injunction; research regarding preliminary injunction	2.25	\$285.00	\$641.25
8/23/2004	Telephone conference with Paul Polidoro regarding PR Law 21, 22 and case law translations	0.25	\$285.00	\$71.25
8/25/04	Review translation of report; Telephone conference with Madeline Roman	0.75	\$285.00	\$213.75
7/1/2004	Review final draft of Motion for Leave to File Document Reply to Defendants' Opposition to Plaintiff; Reply to Response to Motion In Opposition To Plaintiffs	1.25	\$285.00	\$356.25
7/2/2004	Receive & revise Order granting leave to reply	0.25	\$285.00	\$71.25
8/17/2004	Receive Order regarding exhibits for preliminary injunction	0.25	\$285.00	\$71.25

6/10/2005	Receive "Urgent Motion for Oral Argument on Pending Motion.."	0.5	\$285.00	\$142.50
6/20/2005	Receive Order.	0.25	\$285.00	\$71.25
8/9/2005	Receive Opinion and Order; Receive Partial Dismissal, facial challenge	1.25	\$285.00	\$356.25
8/29/2005	Receive Answer to Complaint	0.5	\$285.00	\$142.50
9/1/2005	Review draft of Motion pursuant to Fed. R. Civ. Proc. 54(b); Motion for Entry of Judgment	0.5	\$285.00	\$142.50
9/7/2005	Receive and review final draft of Motion for Entry of Judgment Rule 54(b)	0.5	\$285.00	\$142.50
9/19/2006	Receive and Review Opinion and Order denying Plaintiffs' Motion for Leave (28 USC 1292)	0.75	\$285.00	\$213.75
9/20/2006	Telephone conference with Paul Polidoro regarding status	0.25	\$285.00	\$71.25
11/27/2006	Receive and review USCA JUDGMENT	0.25	\$285.00	\$71.25
12/20/2006	Receive and review order finding moot Motion for Preliminary Injunction	0.25	\$285.00	\$71.25
1/3/2007	Receive Call Order and Schedule matter	0.25	\$285.00	\$71.25
1/12/2006	Receive and review draft of Motion to stay Pursuant to Fed. R. App. Proc.	0.5	\$285.00	\$142.50
1/24/2007	Receive and review Order regarding Plaintiffs' motion	0.25	\$285.00	\$71.25
1/26/2007	Receive and review Motion Adjourn ISC Order	0.25	\$285.00	\$71.25
1/31/2007	Receive and review Order granting Plaintiffs' motion	0.25	\$285.00	\$71.25
2/18/2007	Meeting w/ co counsel discuss strategy and amended complaint, island wide survey	1.5	\$285.00	\$370.50
2/28/2007	Meeting with counsel Polidoro, Mr. Defibaugh and client regarding Surrey and update of access situation	1.25	\$285.00	\$356.25
3/7/2007	Receive and review Communications from Madeline Roman	0.25	\$285.00	\$71.25
4/5/2007	Receive and review Amended Complaint	0.5	\$285.00	\$142.50
4/23/2007	Receive and review Motion to Withdraw Attorney	0.25	\$285.00	\$71.25
4/24/2007	Receive and review Joint Motion; Receive and review Order	0.25	\$285.00	\$71.25
4/25/2007	Receive and review notice of summons issued	0.25	\$285.00	\$71.25

5/30/2007	Receive and review Amended Complaint	0.5	\$285.00	\$142.50
6/4/2007	Receive and review Motion for extension of time	0.25	\$285.00	\$71.25
6/6/2007	Receive and review Motion for extension of time	0.25	\$285.00	\$71.25
6/11/2007	Receive and review Order granting extension	0.25	\$285.00	\$71.25
6/15/2007	Receive and review Motion for extension of time	0.25	\$285.00	\$71.25
6/19/2007	Receive and review Order granting extension	0.25	\$285.00	\$71.25
6/22/2007	Receive & revise Answer to Amended Complaint	0.5	\$285.00	\$142.50
7/5/2007	Receive Motion for extension of time; Receive and review Expert Report update	0.75	\$285.00	\$213.75
7/11/2007	Receive and reviewed ORDER NOTING AS MOOT number	0.25	\$285.00	\$71.25
7/19/2007	Receive and Review ANSWER to Amended Complaint on behalf of Defendant Municipality of Guaynabo; Receive and Reviewed MOTION for extension of time until August 20,2007 to file answer.	0.5	\$285.00	\$142.50
7/20/2007	ORDER GRANTING IN PART AND DENYING IN PART 67	0.25	\$285.00	\$71.25
7/23/2007	Receive and review Motion for extension of time untill AUGUST 13,2007 to file answer filed by Vilma M.Dapena-Rodriguez. Receive and Reviewed MOTION to Dismiss Lack of Jurisdiction as to Asociacion Comunitaria Del Turabo.	0.25	\$285.00	\$71.25
7/24/2007	Receive and Review MOTION for extension of time until August 28,2007 to answer complaint filed by Estancias Gran Vista (HOA); draft Communication to counsel Polidoro regarding amended complaint, service of summons	0.5	\$285.00	\$142.50
7/26/2007	Receive and Review ORDER GRANTING 69 Defendant Asociacion de Propietarios de Prado Alto en Torrimar,Inc. Motion for Extension of time; Recieved and Reviewed MOTION for extension of time to August 15, 2007; Receive and Reviewed MOTION for Extension of time untill August 15,2007 re; 49 Paseo Mayor HOA; Receive and Reviewed MOTION for Extension of time until August 15,2007 to file answer on behalf of G.H.S.Inc	0.5	\$285.00	\$142.50
7/30/2007	Receive and Reviewe ORDER GRANTING IN PART DENYING IN PART 73,74,75.Defendants Asoc.Com.Valle del Lago, Paseo Mayor HOA Inc.,and G.H.S.Inc. Respective Motions for Ext.of Time to answer Plaintiffs Amended Complaint. Receive and Reviewed Motion for Ext. of time untill August 25,2007 To file answer or otherwise Plead	0.25	\$285.00	\$71.25
7/31/2007	Receive and Reviewe Motion for ext,of time; Receive and Reviewed Order Granting in Part and Denuing in	0.25	\$285.00	\$71.25

	Part 77,78. Defendants Municipality of Caguas and Undare Inc.respective Motions for Ext.of Time to Answer Plaintiffs Amended Complaint			
11/20/2007	Telephone conference Paul Polidoro-Re: follow up on settlement possiblity, default entries, pending info on expert.	0.5	\$285.00	\$142.50
12/6/2007	Reviewed case calendar, Telephone conference w co counsel, reviewed and discussed agenda FRCP 26 (f) conference; review inicial disclosure document	1.0	\$285.00	\$285.00
12/13/2007	Review documents for, preparation, and attend Initial disclosure conference	3.5	\$285.00	\$997.50
1/11/2008	Review proposed consent decree with resident associations confer with co counsel on the matter and discuss with Paul Polidoro	1.5	\$285.00	\$427.5
1/14/2008	Meeting with ELA and Municipal codefendants Re: Settlement	3.0	\$285.00	\$855.00
1/22/2008	Telephone conversation with Professor Roman - Re: Documents and Information required of Expert Witness	0.25	\$285.00	\$71.25
2/7/2008	Receive and review Communications from counsel for Urb. Association UNDARE	0.25	\$285.00	\$71.25
2/10/2008	Receive and review letter from Undare attorney RE: discuss settlement; Communications to counsel Polidoro including documents	0.75	\$285.00	\$213.75
2/12/2008	Draft correspondence to professor Roman reviewing courts Order regarding Expert witness and reports; Communication with Madeline Roman regarding compliance with expert order; Receive and review Communications from Madeline Roman in response	1.0	\$285.00	\$285.00
2/13/2008	receive and review letter sent by Mayor of Yauco to Commonwealth Secretary of Justice requesting legal representation; Review correspondence from Madeline Roman	0.25	\$285.00	\$85.50
2/14/2008	Telephone conference w/ co counsel Paul Polidoro - Re: follow up meeting with municipal defendants settlement discussions, positions assumed, implications etc.	0.25	\$285.00	\$71.25
2/15/2008	Review proposed consent decree with municipaldefendants; Telephone conference w/co counsel - Re: propossed consent decree 30min. with Municipal defendants; attend settlement conference hearing	2.0	\$285.00	\$570.00
2/22/2008	Review notes and doc in preparation for settlement hearing; attend Settlement Hearing	3.0	\$285.00	\$855.00
3/4/2008	Draft corresponce to Madeline Roman- Follow up; Receive and Reviewed MOTION for ext.of time untill August 25,2007	0.25	\$285.00	\$71.25
3/18/2008	Receive and review additional documents for Plaintiffs' inicial disclosures	0.75	\$285.00	\$213.75
4/1/2008	Attend ISC hearing; discussed stipulations, Discovery; meeting with co-counsel Polidoro	3.0	\$285.00	\$855.00
4/4/2008	Appear at Status Conference, discussed remedies/compliance	1.0	\$285.00	\$285.00

3/9/2008	Telephone conference with Madeline Roman to follow up on documents	0.25	\$285.00	\$71.25
3/10/2008	Receive and review documents, certification prepared by Madeline Roman	0.25	\$285.00	\$71.25
4/15/2008	Receive and review inicial disclosures sent by Commonwealth Defendants	0.25	\$285.00	\$71.25
6/3/2008	Receive and review Communications from all counsel for Municipality of Caguas; inicial disclosures	0.5	\$285.00	\$142.50
6/5/2008	Receive and Review documents requested from Madeline Roman	0.5	\$285.00	\$142.50
7/24/2008	Telephone conference, update on issues pending	0.25	\$285.00	\$71.25
8/5/2008	Attend deposition of Migdalia Rosado, take notes	2.75	\$285.00	\$783.75
8/6/2008	Attend deposition of Habriel Rodriguez (ARPE)	3.0	\$285.00	\$855.00
9/11/2008	Telephone conference with Madeline Roman regarding report and accompanying documents	0.5	\$285.00	\$142.50
9/15/2008	Identify documents regarding Expert Report; draft letter to defendants counsel providing documents	0.5	\$285.00	\$142.50
9/16/2008	Telephone conference with counsel Polidoro regarding summons; draft letter to counsel Polidoro	0.5	\$285.00	\$142.50
9/26/2008	Attend deposition of Dr. Blakely; Deposition of Madeline Roman	7.0	\$285.00	\$1,995.00
8/10/2009	Receive and review Opinion and Order of Crt.and final Judgment	1.5	\$285.00	\$427.50
8/17/2009	Examine case law on attorney fees for prevailing defendants in civil Rights cases; review opinion; telephone conference w/ counsel Paul Polidoro regarding appeal , issues and strategy	3.75	\$285.00	\$1,068.75
8/20/2009	Receive and review defendant Pacifica's Motion for Fees; Review draft of plaintiff's motion to Stay	0.5	\$285.00	\$142.50
8/24/2009	Receive and review Mun. of Caguas Motion for Costs and fees	0.5	\$285.00	\$142.50
8/26/2009	Review draft of plaintiff's Motion to Stay defendant's Bill of Costs; receive and review Motion filed.	0.75	\$285.00	\$213.75
9/3/2009	Receive and review Court Order granting Stay of motions for costs; review Bill of costs filed by Pacifica	0.75	\$285.00	\$213.75
9/9/2009	Receive and review several defendants motion and Bill of costs	0.75	\$285.00	\$213.75
9/14/2009	Receive and review Notice of transmittal of record on appeal; telephone conference w/ expert witness regarding status of the case	0.50	\$285.00	\$142.50
9/15/2009	Receive and Review defendants Mun. Gaynabo , SJ, Bayamon motion Opposing request for Stay of Costs and fees	0.75	\$285.00	\$213.75
9/17/2009	Receive , review and schedule case management deadlines	0.50	\$285.00	\$142.50
9/21/2009	Receive and review Court's Order	0.50	\$285.00	\$142.50

9/24/2009	Telephone conference with counsel Polidoro on pending matters for appeal; receive and review several Notices of Appearance	0.75	\$285.00	\$213.75
9/25/2007	Meeting with Paul Polidoro to discuss issues of delegation of powers; ARPE regulations; crime statistics	1.0	\$285.00	\$285.00
9/25/2008	Prepare for deposition of Madeline Roman; review related documents and opinion; meet with Madeline Roman in preparation for deposition	1.5	\$285.00	\$427.50
9/28/2009	Review transcript report, designation of record, notice of appearance; Motion to amend caption of case; receive and review appearances filed by municipalities and urb. Defendants.	2.00	\$285.00	\$570.00
9/30/2009	Review Appellant's Statement of Issues on Appeal,	.50	\$285.00	\$142.50
10/23/2009	Receive and review notice of Pre argument settlement conference	.25	\$285.00	\$62.50
10/9/2009		2.50	\$285.00	\$712.50
11/2/2009	Review draft of Confidential Memorandum and telephone conference w/ counsel Polidoro	1.25	\$285.00	\$356.25
11/8/2009	Prepare for Settlement conference - review documents and record.	2.50	\$285.00	\$712.50
11/9/2009	Settlement Conference ;meeting with counsel Polidoro and clients	2.50	\$285.00	\$712.50
12/3/2009	Review PR case law on access law, government immunity issues, in reviewing draft of brief , review draft of brief .	2.50	\$285.00	\$712.50
12/4/2009	Review draft of Appellants Brief (facts and 1983 elements); receive and review court order of same date	3.50	\$285.00	\$997.50
12/7/2009	Receive and review Court Order :Appellant's Briefing notice ,schedule items	.75	\$285.00	\$213.75
12/18/2010	Meeting with ACLU staff to discuss possible amicus, identify issues of interest	1.00	\$285.00	\$285.00
12 28/2010	Identify and provide relevant documents and references for ACLU to review on collaboration as amicus.	1.00	\$285.00	\$285.00
1/13/2010	Receive and review Final draft of brief: motion for leave to file Certified translation, corporate disclosures, joint appendix.	1.25	\$285.00	\$356.25
1/14/2010	Follow up with ACLU staff on status of Amicus.	.25	\$285.00	\$71.25
1/20/2010	Receive and review Motion for leave to file brief on behalf of ACLU affiliates and chapters and; notices to appear	2.50	\$285.00	\$712.50
1/21/2010	Receive and review several notices to appear	.50	\$285.00	\$142.50
2/1/2010	Receive and review notices to appear	.25	\$285.00	\$71.25
2/2/2010	Receive and review Motion to extend time to file brief filed by Mun. of Gurabo	.25	\$285.00	\$71.25
2/3/2010	Receive and Review Court's Order	.25	\$285.00	\$71.25
2/12/2010	Receive and review :Motion to extend time to file brief ; and Motion for oversized brief , Court order	.50	\$285.00	\$142.50

2/26/2010	Review Appellee's Brief (Commonwealth Def) ; Motion to extend time filed by Mun. of Bayamon, Guaynabo, San Juan; and Trujillo Alto; Plaintiff's response to Motion to extend time.	2.25	\$285.00	\$641.25
3/2/2010	Review Brief filed by Municipality of Caguas:	1.50	\$285.00	\$427.50
4/2/2010	Receive and review: brief filed by Trujillo Alto; Pacifica Homeowner Asso. Appellees brief ; order of Court entered.	1.25	\$285.00	\$356.25
4/23/2010	Receive /Review Appellees brief filed by the municipality of Bayamon, Guyanabo , and SJ, .	.50	\$285.00	\$142.50
4/24-25 /2010	Review and analyze Appellees SJ, Bayamon: Brief filed by Caguas , Commonwealth, Urbanization Arguments in preparation for discussion w/counsel Polidoro regarding Reply ; telephone conference w Polidoro regarding arguments in common , different , issues to reply .	3.50	\$285.00	\$997.50
6/25-28 /2010	Receive and review motions regarding Pacificas legal counsel request to withdraw and Court's order.	.25	\$285.00	\$71.25
8/3/2010	Receive Court Order setting oral argument	.25	\$285.00	\$71.25
8/5/2010	Communication w/ counsel Polidoro regarding oral argument , panel .	.25	\$285.00	\$71.25
8/9-30 /2010	Receive and review notices of Designation for oral argument and motion	.50	\$285.00	\$142.50
8/25/2010	Telephone conference w/ counsel Polidoro regarding assigned panel, oral argument	0.75	\$285.00	\$213.75
9/15/2010	Appear w/ counsel Polidoro at oral argument, take notes regarding questions asked by the Panel of both plaintiffs and defendants; meeting with clients interpret/discuss hearing.	3.00	\$285.00	\$855.00
2/7/2011	Receive and review Opinion of the Court and judgment	1.50	\$285.00	\$427.50
2/8/2011	Communication w/counsel Polidoro regarding Opinion issued , implications and strategy; telephone conference with counsel Polidoro	1.50	\$285.00	\$427.50
2/22/2011	Receive and Review Petition for rehearing and rehearing en banc filed by Bayamon, Guaynabo, SJ; Motion for leave to file oversized brief; Motion to join ; Reread Opinion and Order of Court in light of petition; review Rule rehearing.	2.50	\$285.00	\$712.50
2/25/2011	Research case law attorney fees in absence of complete success, prevailing party in civil rights litigation ; application for fees ; communication w/counsel Polidoro on the matter	2.50	\$285.00	\$712.50
3/8/2011	Receive and review Court Order granting motions to join.	.25	\$285.00	\$71.25
4/1/2011	Receive and Review Court order denying petition for panel rehearing; Order denying petition petition for rehearing	.75	\$285.00	\$213.75
4/18-20/ 2011	Research re: fee rates, prevailing rates , community considered . (Martinez – Velez v. Hernandez 1 st Cir. 2007; Ginorio v. Contreras DPR 2009); fees awarded to NVA.	3.0	\$285.00	\$855.00
4/20-24/ 2011	Draft fee application, follow up supporting affidavit	6.0	\$285.00	\$1,710.00

	TOTAL	149.00	\$285.00	\$42,465.00
--	--------------	--------	----------	-------------